

RILEY A. CLAYTON
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HALL JAFFE & CLAYTON, LLP
7425 PEAK DRIVE
LAS VEGAS, NEVADA 89128
(702) 316-4111
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*Attorneys for Defendant, State Farm Fire and
Casualty Company and State Farm Mutual Automobile Ins. Co.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN SELF,

Plaintiff,

vs.

STATE FARM FIRE AND CASUALTY
COMPANY; STATE FARM MUTUAL
AUTOMOBILE INSURANCE COMPANY;
DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

CASE NO.:

NOTICE OF REMOVAL

TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEVADA

Defendants, State Farm Fire and Casualty Company ("State Farm Fire"), and State Farm Mutual
Automobile Insurance Company ("State Farm Auto"), by and through their attorneys, Hall Jaffe &
Clayton, LLP, hereby remove this action to the United States District Court for the District of Nevada.

The basis of removal is as follows:

1. This Court has original jurisdiction over the subject matter of this action under the
provisions of 28 U.S.C. § 1332 in that there is complete diversity between the parties and more than
\$75,000 in controversy, exclusive of interest and costs.

2. State Farm Fire and State Farm Auto are defendants in the above-entitled action now
pending in the Eighth Judicial District Court, Clark County, Nevada, Case No. A-17-765247-C. State
Farm Fire and State Farm Auto are Illinois corporations with their principal place of business in that

1 state, and are authorized to transact insurance under the laws of the State of Nevada. Plaintiff, John Self
2 (hereinafter "Plaintiff"), is a citizen of the state of Nevada.

3 3. With respect to the amount in controversy, the allegations in the complaint coupled with
4 other documents, including a judgment stemming from lawsuit styled *John Self v. Manuel Blanco, Jr.*
5 *and Judy L. Medina*, Clark County, Nevada, Case No. A-14-A697640-C (the "Underlying Lawsuit"), all
6 of which are fully incorporated by reference herein, establish an amount in controversy well in excess of
7 \$75,000. In sum, the complaint herein alleges that John Self filed a bodily injury/negligence lawsuit,
8 i.e., the Underlying Lawsuit, against Manuel Blanco, Jr. and Judy L. Medina, which arose from injuries
9 and damages that John Self allegedly sustained from a motorized mini-bike accident; that State Farm
10 purportedly failed to defend and/or indemnify Manuel Blanco, Jr. And Judy L. Medina in the Underlying
11 Lawsuit; that John Self obtained a judgment against Manuel Blanco, Jr. and Judy L. Medina in the
12 amount of \$1,000,000 in the Underlying Lawsuit; and that by assignment of rights, John Self is now
13 pursuing enforcement of the \$1,000,000 judgment against Manuel Blanco, Jr.'s and Judy L. Medina's
14 insurance carriers, State Farm Fire and State Farm Auto. As such, the amount in controversy is at least
15 \$1,000,000, which greatly exceeds the \$75,000 threshold amount for diversity jurisdiction, thereby
16 making this case appropriate for removal.

17 4. The Notice of Removal is timely. Service of the Summons and Complaint upon State
18 Farm Fire was effected by service upon the Commissioner of Insurance of the State of Nevada on
19 January 2, 2018. Service of the Summons and Complaint upon State Farm Fire was effect by service
20 upon the Commissioner of Insurance of the State of Nevada on January 2, 2018.

21 5. Copies of Plaintiff's Complaint, Summonses, and Proofs of Service, with respect to
22 State Farm Fire and State Farm Auto are attached hereto as "Exhibit A – Summonses and Service Docs."
23 This constitutes all of the papers and pleadings served on State Farm.

24 6. State Farm Fire and State Farm Auto have concurrently filed a copy of this Notice of
25 Removal with the Clark County District Court Clerk, and has served a copy of this upon Plaintiff.


26 Based on the foregoing, Defendants, State Farm Fire and State Farm Auto, hereby remove the
27

28 ///

1 above action now pending in District Court, Clark County, Nevada, Case No. A-17-765247-C, to this
2 Court.

3 DATED this 24th day of January, 2018.

4 HALL JAFFE & CLAYTON, LLP

5
6 By 
7 RILEY A. CLAYTON
8 Nevada Bar No. 005260
9 7425 Peak Drive
10 Las Vegas, Nevada 89128
11 Attorneys for Defendant,
12 State Farm Mutual Automobile Ins. Co.
13
14
15
16
17
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28

CERTIFICATE OF E-SERVICE

Pursuant to Rule 5(b) of the Federal Rules of Civil Procedure, I hereby certify under penalty of perjury that I am an employee of HALL JAFFE & CLAYTON, LLP, and that on November ____, 2017, the foregoing **NOTICE OF REMOVAL**, was served upon the parties via the Court's e-filing and service program, addressed as follows:

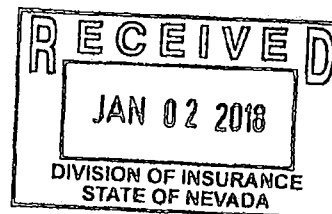
Justin L. Watkins, Esq.
Sabrina G. Wibicki, Esq.
ATKINSON WATKINS & HOFFMANN, LLP
10789 W. Twain Avenue, Suite 100
Las Vegas, NV 89135
Tel: (702) 562-6000
Fax: (702) 562-6266
Email: jwatkins@awhlawyers.com
swibicki@awhlawyers.com
Attorneys for Plaintiff

An Employee of
HALL JAFFE & CLAYTON, LLP

EXHIBIT “A”
(Summonses and Service Docs)

EXHIBIT “A”
(Summonses and Service Docs)

ORIGINAL



SUMM
JUSTIN L. WATKINS, ESQ.
Nevada Bar No. 9217
SABRINA G. WIBICKI, ESQ.
Nevada Bar No. 10669
ATKINSON WATKINS & HOFFMANN, LLP
10789 W. Twain Avenue, Suite 100
Las Vegas, Nevada 89135
Telephone: 702-562-6000
Facsimile: 702-562-6066
Email: jwatkins@awhlawyers.com
Email: swibicki@awhlawyers.com
Attorneys for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

JOHN SELF,

Plaintiff,

CASE NO.: A-17-765247-C
DEPT. NO.: XV

v.

STATE FARM FIRE AND CASUALTY
COMPANY; STATE FARM MUTUAL
AUTOMOBILE INSURANCE COMPANY;
DOE INDIVIDUALS I through X, inclusive;
and ROE CORPORATIONS I through X,
inclusive,

Defendants.

SUMMONS

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU
WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ
THE INFORMATION BELOW.**

TO: Defendant STATE FARM FIRE AND CASUALTY COMPANY

A civil Complaint ("Complaint") has been filed by the Plaintiff against you for the relief set forth in the Complaint.

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following.

1 a. File with the Clerk of this Court, whose address is shown below, a formal
2 written response to the Complaint in accordance with the rules of the Court, with the appropriate
3 filing fee.

4 b. Serve a copy of your response upon the attorney whose name and address is
5 shown below.


6 2. Unless you respond, your default will be entered upon application of the Plaintiff
7 and failure to so respond will result in a judgment of default against you for the relief demanded in
8 the Complaint, which could result in the taking of money or property or other relief requested in
9 the Complaint.

10 3. If you intend to seek the advice of an attorney in this matter, you should do so
11 promptly so that your response may be filed in time.


12 4. The State of Nevada, its political subdivisions, agencies, officers, employees, board
13 members, commission members and legislators each have 45 days after service of this Summons
14 within which to file an Answer or other responsive pleading to the Complaint.

15 Issued at direction of:

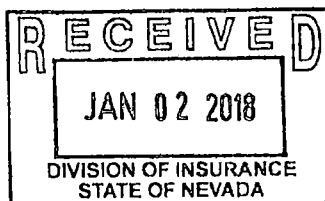
16 ATKINSON, WATKINS & HOFFMANN, LLP

17 
18 JUSTIN WATKINS, ESQ.
19 Nevada Bar No. 9217
20 SABRINA G. WIBICKI, ESQ.
21 Nevada Bar No. 10669
22 10789 W. Twain Avenue, Suite 100
23 Las Vegas, Nevada 89135
24 *Attorney for Plaintiff*

CLERK OF THE COURT

17 
18 DEPUTY CLERK Date
19 Regional Justice Center
20 200 Lewis Avenue
21 Las Vegas, Nevada 89101

23 **NOTE: When service is by publication, add a brief statement of the object of the action. See**
24 **Nevada Rules of Civil Procedure 4(b)**



Electronically Filed
11/28/2017 5:08 PM
Steven D. Grierson
CLERK OF THE COURT

1 **COMP**
2 JUSTIN L. WATKINS, ESQ.
3 Nevada Bar No. 9217
4 SABRINA G. WIBICKI, ESQ.
5 Nevada Bar No. 10669
6 ATKINSON WATKINS & HOFFMANN, LLP
7 10789 W. Twain Avenue, Suite 100
8 Las Vegas, Nevada 89135
9 Telephone: 702-562-6000
10 Facsimile: 702-562-6066
11 Email: jwatkins@awhlawyers.com
12 Email: swibicki@awhlawyers.com
13 *Attorneys for Plaintiff*

8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 JOHN SELF,
11
12 Plaintiff,

CASE NO.: A-17-765247-C
DEPT. NO.: Department 15

13 v.

14 STATE FARM FIRE AND CASUALTY
15 COMPANY; STATE FARM MUTUAL
16 AUTOMOBILE INSURANCE COMPANY;
17 DOE INDIVIDUALS I through X, inclusive;
18 and ROE CORPORATIONS I through X,
19 inclusive,

20 Defendants.

21 **COMPLAINT**

22 COMES NOW, Plaintiff, JOHN SELF (hereinafter referred to as "Plaintiff" or "Mr.
23 SELF"), by and through his attorneys of record, ATKINSON WATKINS & HOFFMANN, LLP,
24 and hereby alleges and complains as follows:

25 **I.**

26 **PARTIES**

27 1. At all times relevant herein, Plaintiff JOHN SELF was and is a resident of Clark
28 County, Nevada.

...

...

1 2. Plaintiff is informed and believes, and thereupon alleges, that, at all times relevant
2 herein, Defendant STATE FARM FIRE AND CASUALTY COMPANY was and is an insurance
3 company duly licensed and authorized to conduct business in the State of Nevada.

4 3. Plaintiff is informed and believes, and thereupon alleges, that, at all times relevant
5 herein, Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY (with
6 STATE FARM FIRE AND CASUALTY COMPANY hereinafter collectively referred to as
7 "Defendants" or "STATE FARM") was and is an insurance company duly licensed and authorized
8 to conduct business in the State of Nevada.

9 4. The true names of Defendants DOE INDIVIDUALS I through X and ROE
10 CORPORATIONS I through X (hereinafter collectively referred to as "DOE Defendants") are
11 unknown to Plaintiff who, therefore, sues said Defendants by such fictitious names. When the true
12 names and capacities of these Defendants are ascertained, Plaintiff will amend his Complaint
13 accordingly.

14 5. Defendants DOES I through X and ROE CORPORATIONS I through X are
15 individuals and/or entities who were/are agents, servants, or employees of STATE FARM and, at
16 all times relevant herein, were acting within the scope and course of said agency or employment
17 with knowledge, permission and/or consent of STATE FARM. Plaintiff alleges that one or more
18 of the DOE Defendants was responsible for the insurance policies issued to MANUEL BLANCO,
19 JR. and JUDY L. MEDINA which were in effect on March 27, 2013 to defend and indemnify
20 MANUEL BLANCO, JR. and JUDY L. MEDINA for any claim and lawsuits, including the claim
21 initiated and lawsuit filed by Plaintiff JOHN SELF against MANUEL BLANCO, JR. and JUDY
22 L. MEDINA due to a miniature motorcycle accident that caused Mr. SELF to suffer serious injuries.

23 II.

24 GENERAL ALLEGATIONS AND FACTS COMMON TO ALL CLAIMS FOR RELIEF

25 6. At all times mentioned herein, MANUEL BLANCO, JR. and JUDY L. MEDINA
26 were covered under a homeowners' policy of insurance from STATE FARM FIRE AND
27 CASUALTY COMPANY, and/or DOE Defendants, in effect on March 27, 2013 (hereinafter
28 referred to as "Homeowners Insurance Policy").

1 7. At all times mentioned herein, MANUEL BLANCO, JR. and JUDY L. MEDINA
2 were covered under an automobile policy of insurance from STATE FARM MUTUAL
3 AUTOMOBILE INSURANCE COMPANY, and/or DOE Defendants, in effect on March 27, 2013
4 (hereinafter referred to as "Automobile Insurance Policy").

5 8. MANUEL BLANCO, JR. and JUDY L. MEDINA's Homeowners Insurance Policy
6 with STATE FARM FIRE AND CASUALTY COMPANY contained liability policy limits.

7 9. MANUEL BLANCO, JR. and JUDY L. MEDINA's Homeowners Insurance Policy
8 with STATE FARM FIRE AND CASUALTY COMPANY included a provision that allowed for
9 payment for a defense and indemnification.

10 10. MANUEL BLANCO, JR. and JUDY L. MEDINA's Automobile Insurance Policy
11 with STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY contained liability
12 policy limits of \$15,000.00.

13 11. MANUEL BLANCO, JR. and JUDY L. MEDINA's Automobile Insurance Policy
14 with STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY included a provision
15 that allowed for payment for a defense and indemnification.

16 12. On March 27, 2013, MANUEL BLANCO, JR. and JUDY L. MEDINA were the
17 owners of a certain miniature motorcycle. On said date, Mr. BLANCO and/or Ms. MEDINA asked
18 Plaintiff JOHN SELF to test drive their miniature motorcycle around their neighborhood. While
19 Mr. SELF was riding the miniature motorcycle, the accelerator stuck in the "on" position and he
20 was unable to stop the motorcycle, subsequently striking the curb and suffering serious injuries.

21 13. On March 13, 2014, Plaintiff JOHN SELF filed a lawsuit against MANUEL
22 BLANCO, JR. and JUDY L. MEDINA arising out of the incident which occurred on
23 March 27, 2013 (hereinafter referred to as "the underlying lawsuit").

24 14. STATE FARM and/or DOE Defendants refused to hire counsel and defend
25 MANUEL BLANCO, JR. and JUDY L. MEDINA in the underlying lawsuit.

26 15. On October 5, 2016, a Judgment was entered in favor of Plaintiff JOHN SELF and
27 against MANUEL BLANCO, JR. and JUDY L. MEDINA in the amount of \$1,000,000.00.

28 ...

17. STATE FARM failed to indemnify MANUEL BLANCO, JR. and JUDY L. MEDINA under their Homeowners Insurance Policy or Automobile Insurance Policy for the full amount of the Judgment obtained.

7 18. In exchange for a covenant not to execute against the Judgment, MANUEL
8 BLANCO, JR. and JUDY L. MEDINA have assigned to Plaintiff JOHN SELF all of their rights,
9 interest and claims in the policies issued by STTAE FARM, or any other applicable insurer, for any
10 claims and/or causes of action arising under Nevada law.

III.
FIRST CAUSE OF ACTION
(Breach of Contract)

13 19. Plaintiff repeats and realleges each and every allegation contained in Paragraphs 1
14 through 18 herein above and incorporate the same by reference as though fully set forth herein.

20. At all times relevant herein, MANUEL BLANCO, JR. and JUDY L. MEDINA contracted for liability insurance from Defendants and/or DOE Defendants under a Homeowners Insurance Policy and an Automobile Insurance Policy, both of which included payments for defense in a lawsuit and indemnification.

21. MANUEL BLANCO, JR. and JUDY L. MEDINA filed a claim for benefits with
STATE FARM FIRE AND CASUALTY COMPANY pursuant to their Homeowners Insurance
Policy for the claim initiated and lawsuit filed by Plaintiff JOHN SELF.

22 22. MANUEL BLANCO, JR. and JUDY L. MEDINA filed a claim for benefits with
23 STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY pursuant to their
24 Automobile Insurance Policy for the claim initiated and lawsuit filed by Plaintiff JOHN SELF.

25 23. Defendants and/or DOE Defendants failed to perform their duties under the
26 Homeowners Insurance Policy and Automobile Insurance Policy, however, by failing to pay the
27 personal liability limits to Plaintiff JOHN SELF, who was a third-party beneficiary of MANUEL

1 BLANCO, JR. and JUDY L. MEDINA's Homeowners Insurance Policy and Automobile Insurance
2 Policy.

3 24. Defendants and/or DOE Defendants further failed to perform their duties under the
4 Homeowners Insurance Policy and Automobile Insurance Policy by failing to provide MANUEL
5 BLANCO, JR. and JUDY L. MEDINA with a defense and indemnification relative to the
6 underlying lawsuit.

7 25. As a result of Defendants' and/or DOE Defendants' failure to perform their duties
8 under the Subject Policy, Defendants and/or DOE Defendants materially breached the subject
9 insurance policies.

10 26. As a result of Defendants' and/or DOE Defendants' breach of the subject insurance
11 policies, Plaintiff JOHN SELF has incurred compensatory damages.

12 27. As a result of Defendants' and/or DOE Defendants' breach of the subject insurance
13 policies, Plaintiff JOHN SELF has consequential and incidental damages.

14 28. As a result of Defendants' and/or DOE Defendants' breach of the subject insurance
15 policies, it has been necessary for Plaintiff JOHN SELF to retain the services of an attorney to
16 pursue this claim and Plaintiff is, therefore, entitled to recover reasonable attorneys' fees.

17 WHEREFORE, Plaintiff prays for judgment in their favor and against Defendants and/or
18 DOE Defendants as follows:

- 19 1. General and special damages in excess of \$1,000,000.00;
- 20 2. Compensatory and expectation damages for denied policy benefits;
- 21 3. Consequential damages, including emotional distress and attorney's fees;
- 22 4. Costs of suit incurred herein; and

23 ...

24 ...

25 ...

26 ...

27 ...

28 ...

1 5. Any other and further relief as this Honorable Court may deem proper under the
2 circumstances.

3 DATED this 28th day of November, 2017.

4 ATKINSON WATKINS & HOFFMANN, LLP

5
6 By: /s/ Sabrina G. Wibicki, Esq.
7 JUSTIN L. WATKINS, ESQ.
8 Nevada Bar No. 9217
9 SABRINA G. WIBICKI, ESQ.
10 Nevada Bar No. 10669
11 10789 W. Twain Avenue, Suite 100
12 Las Vegas, Nevada 89135
13 Attorneys for Plaintiff

BRIAN SANDOVAL
Governor

STATE OF NEVADA

C.J. MANTHE
Director

BARBARA D. RICHARDSON
Commissioner



DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE

3300 West Sahara Avenue, Suite 275
Las Vegas, Nevada 89102-3200
(702) 486-4009 • Fax (702) 486-4007
Website: doi.nv.gov
E-mail: insinfo@doi.nv.gov

January 8, 2018

Sabrina G. Wibicki, Esq.
ATKINSON WATKINS & HOFFMANN, LLP
10789 W. Twain Ave., Ste. 100
Las Vegas, NV 89135

RE: John Self vs. State Farm Fire and Casualty Company, et al.
District Court, Clark County, Nevada
Case No. A-17-765247-C

Dear Ms. Wibicki:

The Division received the service of process documents on January 2, 2018, regarding the above-entitled matter. Service has been completed on State Farm Fire & Casualty Company this date and enclosed are the following:


1. A copy of our letter to State Farm Fire & Casualty Company dated January 8, 2018;
2. A certified copy of the Proof of Service dated January 8, 2018; and
3. Your receipt in the amount of \$30.00.

Pursuant to *Nevada Revised Statutes (NRS)* 680A.260, 685A.200, and 685B.050, all documents after initial service of process may be served directly to the party.

If you have any questions regarding this service, please so advise.

Sincerely,

BARBARA D. RICHARDSON
Commissioner of Insurance

By: 
RHONDA KELLY
Service of Process Clerk

Enclosures

c: State Farm Fire & Casualty Company

BRIAN SANDOVAL
Governor

STATE OF NEVADA

C.J. MANTHE
Director

BARBARA D. RICHARDSON
Commissioner



DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE

3300 West Sahara Avenue, Suite 275
Las Vegas, Nevada 89102-3200
(702) 486-4009 • Fax (702) 486-4007
Website: doi.nv.gov
Email: insinfo@doi.nv.gov

January 8, 2018

State Farm Fire & Casualty Company
c/o CSC Services of Nevada, Inc.
2215 Renaissance Dr., Ste. B
Las Vegas, NV 89119-6727

RE: John Self vs. State Farm Fire and Casualty Company, et al.
District Court, Clark County, Nevada
Case No. A-17-765247-C

Dear Sir or Madam:

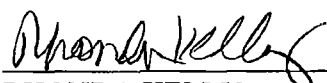
Enclosed please find the following documents: Summons and Complaint. These documents have been served upon the Commissioner of Insurance as your attorney for service of process on January 2, 2018.

The appropriate action should be taken immediately, as you may only have 30 days from the date of this service to respond.

If you have any questions regarding this service, please advise.

Sincerely,

BARBARA D. RICHARDSON
Commissioner of Insurance

By: 
RHONDA KELLY
Service of Process Clerk

Enclosures

c: Sabrina G. Wibicki, Esq.


PROOF OF SERVICE

I hereby declare that on this day I served a copy of the Summons and Complaint upon the following defendant in the within matter, by shipping a copy thereof, via Certified mail, return receipt requested, to the following:

State Farm Fire & Casualty Company
c/o CSC Services of Nevada, Inc.
2215 Renaissance Dr., Ste. B
Las Vegas, NV 89119-6727
CERTIFIED MAIL NO. 7016 3010 0000 0484 2161

I declare, under penalty of perjury, that the foregoing is true and correct.

DATED this 8th day of January, 2018.


RHONDA KELLY
Employee of the State of Nevada
Department of Business and Industry
Division of Insurance

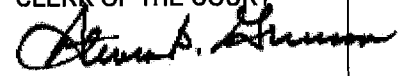
RE: John Self vs. State Farm Fire and Casualty Company, et al.
District Court, Clark County, Nevada
Case No. A-17-765247-C



State of Nevada, Division of Insurance
This document on which this certificate
is stamped is a full, true and correct
copy of the original.

Date: 1/8/18 By: 

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1/22/2018 2:44 PM
Steven D. Grierson
CLERK OF THE COURT



1 **PSEER**
2 JUSTIN L. WATKINS, ESQ.
3 Nevada Bar No. 9217
4 SABRINA G. WIBICKI, ESQ.
5 Nevada Bar No. 10669
6 ATKINSON WATKINS & HOFFMANN, LLP
7 10789 W. Twain Avenue, Suite 100
8 Las Vegas, Nevada 89135
9 Telephone: 702-562-6000
10 Facsimile: 702-562-6066
11 Email: jwatkins@awhlawyers.com
12 Email: swibicki@awhlawyers.com
13 *Attorneys for Plaintiff*

8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 JOHN SELF,
11
12 Plaintiff,

CASE NO.: A-17-765247-C
DEPT. NO.: XV

13 v.

14 STATE FARM FIRE AND CASUALTY
15 COMPANY; STATE FARM MUTUAL
16 AUTOMOBILE INSURANCE COMPANY;
17 DOE INDIVIDUALS I through X, inclusive;
18 and ROE CORPORATIONS I through X,
19 inclusive,

20 Defendants.

21 **PROOF OF SERVICE RE: DEFENDANT STATE FARM MUTUAL**
22 **AUTOMOBILE INSURANCE COMPANY**

23 Attached hereto as **Exhibit "1"** is the Proof of Service of Summons and Complaint on
24 Defendant STATE FARM FIRE MUTUAL AUTOMOBILE INSURANCE COMPANY.

25 DATED this 22nd day of January, 2018.

26 ATKINSON WATKINS & HOFFMANN, LLP

27 By: /s/ Sabrina G. Wibicki, Esq.
28 SABRINA G. WIBICKI, ESQ.
Nevada Bar No. 10669
10789 W. Twain Ave., Suite 100
Las Vegas, NV 89135
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Atkinson Watkins & Hoffmann, LLP and that on the 22nd day of January, 2018, I caused to be served via Wiznet, the Court's mandatory efilingservice system, a true and correct copy of the document described herein.

Document Served: **PROOF OF SERVICE RE: DEFENDANT STATE FARM
MUTUAL AUTOMOBILE INSURANCE COMPANY**

Person(s) Served:

Tatiana Sison
ROGERS MASTRANGELO CARVALHO & MITCHELL
700 S. Third Street
Las Vegas, NV 89101
Email: tsison@rmcmlaw.com
Attorney for Defendant

/s/ Jennifer Lopez
An Employee of Atkinson Watkins & Hoffmann LLP

EXHIBIT 1

BRIAN SANDOVAL
Governor

STATE OF NEVADA

C.J. MANTHE
Director

BARBARA D. RICHARDSON
Commissioner



DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE
3300 West Sahara Avenue, Suite 275
Las Vegas, Nevada 89102-3200
(702) 486-4009 • Fax (702) 486-4007
Website: doi.nv.gov
E-mail: insinfo@doi.nv.gov

January 8, 2018

Sabrina G. Wibicki, Esq.
ATKINSON WATKINS & HOFFMANN, LLP
10789 W. Twain Ave., Ste. 100
Las Vegas, NV 89135

RE: John Self vs. State Farm Fire and Casualty Company, et al.
District Court, Clark County, Nevada
Case No. A-17-765247-C

Dear Ms. Wibicki:

The Division received the service of process documents on January 2, 2018, regarding the above-entitled matter. Service has been completed on State Farm Mutual Automobile Insurance Company this date and enclosed are the following:


1. A copy of our letter to State Farm Mutual Automobile Insurance Company dated January 8, 2018;
2. A certified copy of the Proof of Service dated January 8, 2018; and
3. Your receipt in the amount of \$30.00.

Pursuant to *Nevada Revised Statutes (NRS)* 680A.260, 685A.200, and 685B.050, all documents after initial service of process may be served directly to the party.

If you have any questions regarding this service, please so advise.

Sincerely,

BARBARA D. RICHARDSON
Commissioner of Insurance

By: 
RHONDA KELLY
Service of Process Clerk

Enclosures

c: State Farm Mutual Automobile Insurance Company

BRIAN SANDOVAL
Governor

STATE OF NEVADA

C.J. MANTHE
Director

BARBARA D. RICHARDSON
Commissioner



DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE
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(702) 486-4009 • Fax (702) 486-4007
Website: doi.nv.gov
E-mail: insinfo@doi.nv.gov

January 8, 2018

State Farm Mutual Automobile Insurance Company
c/o CSC Services of Nevada, Inc.
2215 Renaissance Dr., Ste. B
Las Vegas, NV 89119-6727

RE: John Self vs. State Farm Fire and Casualty Company, et al.
District Court, Clark County, Nevada
Case No. A-17-765247-C

Dear Sir or Madam:

Enclosed please find the following documents: Summons and Complaint. These documents have been served upon the Commissioner of Insurance as your attorney for service of process on January 2, 2018.

The appropriate action should be taken immediately, as you may only have 30 days from the date of this service to respond.

If you have any questions regarding this service, please advise.

Sincerely,

BARBARA D. RICHARDSON
Commissioner of Insurance

By:

A handwritten signature in cursive script, appearing to read "Rhonda Kelly", is written over a horizontal line.
RHONDA KELLY
Service of Process Clerk

Enclosures

c: Sabrina G. Wibicki, Esq.


PROOF OF SERVICE

I hereby declare that on this day I served a copy of the Summons and Complaint upon the following defendant in the within matter, by shipping a copy thereof, via Certified mail, return receipt requested, to the following:

State Farm Mutual Automobile Insurance Company
c/o CSC Services of Nevada, Inc.
2215 Renaissance Dr., Ste. B
Las Vegas, NV 89119-6727
CERTIFIED MAIL NO. 7016 3010 0000 0484 2161

I declare, under penalty of perjury, that the foregoing is true and correct.

DATED this 8th day of January, 2018.


RHONDA KELLY
Employee of the State of Nevada
Department of Business and Industry
Division of Insurance

RE: John Self vs. State Farm Fire and Casualty Company, et al.
District Court, Clark County, Nevada
Case No. A-17-765247-C



State of Nevada, Division of Insurance
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